

Missouri Department of Natural Resources  
Air Pollution Control Program  
Air Quality Analysis Section/Air Monitoring Unit  
P.O. Box 176 Jefferson City, MO 65102

Dear Mr. Hall:

We are providing the following comments on the proposed 2015 monitoring network plan provided by MDNR for public comment that closes on July 20, 2015. Our review of the plan has identified the following concerns regarding additional sulfur dioxide (SO<sub>2</sub>) monitors being placed for operation and currently in operation around the Ameren UE facilities of Rush Island and Labadie.

- 1) Lack of clarity in the plan regarding the purpose of additional monitoring location(s) considering that neither Labadie or Rush Island are sources affected by the Data Requirements Rule when it is finalized**
- 2) Lack of technical data provided for EPA to analyze MDNR's support for the locations selected for monitoring**

The EPA supports the need and use of modeling and monitoring to determine the impacts from the operation of large sources of SO<sub>2</sub>. The EPA has reiterated through rulemaking and guidance that the most effective control strategies developed for sources of SO<sub>2</sub> involve analyzing the concentrations measured from a robust monitoring network and the results of source oriented dispersion modeling.

In reviewing MDNR's 2015 monitoring network plan, we note that the special purpose monitors discussed in section(s): 2.1 Special Purpose Industrial SO<sub>2</sub> & Meteorological Monitoring near the Labadie Energy Center and 2.2 Special Purpose Industrial SO<sub>2</sub> & Meteorological Monitoring near the Rush Island Energy Center lack sufficient technical data for EPA to analyze whether the locations selected for monitors represent the area(s) where we would expect to observe the greatest concentration of SO<sub>2</sub> due to the operation Ameren's Labadie and Rush Island plants. While the weight of evidence approach explained in section 2.1.1 may be appropriate for identifying a monitoring location, EPA prefers the use of dispersion modeling to assess the appropriateness of the Labadie sites. Similarly for section 2.2 while MDNR states that the dispersion modeling was performed (provided in Appendix 5) to assess the appropriateness of the proposed monitoring locations, the modeling inputs and data was not provided to EPA for review (in Appendix 5), and therefore EPA cannot assess whether the modeling was performed in accordance with EPA guidance.

As a result of these concerns, EPA cannot confidently find that the locations that the monitors have been placed, and are planning to be placed by Ameren UE around Labadie and Rush Island energy centers are optimal for regulatory purposes or the ultimate purpose Ameren UE or MDNR intends. Additionally, the objective and scale of the monitors and the ultimate use of the data obtained from the monitors before or after they are converted to a state or local air monitoring stations (SLAMS) may revise our comments to this plan.

We look forward to working with MDNR to address the issues we have identified regarding the draft 2015 monitoring plan to ensure the State's plan is protective of public health in the state of Missouri.

If you have questions regarding these comments, please contact Larry Gonzalez at 913-551-7041

Sincerely,

Joshua A. Tapp

Bcc Amy Bhesania